

Implementation of the Wildlife and Sport Fish Restoration Improvement Act of 2000



Introduction

This report is submitted in compliance with the directives given in the Wildlife and Sport Fish Restoration Programs Improvement Act of 2000 (PL.106-408). The Act amended the Federal Aid in Wildlife and Sport Fish Restoration Acts (16 U.S.C. 669 et seq. & 16 U.S.C. 777 et seq.) providing the Secretary of the Department of the Interior guidance on how to expend administrative funds in the operation of these Federal Assistance Programs for State Wildlife and Sport Fish Restoration.

As directed by this Act, the following information is included in this report to the House Committee on Resources and the Senate Committee on Environment and Public Works:

- 1) the steps that have been taken to comply with this Act;
- 2) a description of the extent to which compliance with this Act has required a reduction in the number of personnel assigned to administer, manage, and oversee the Federal Assistance Program for State Wildlife and Sport Fish Restoration;
- 3) suggested revisions to this Act that would be desirable in order for the Secretary of the Interior to adequately administer the Program and ensure that funds provided to State agencies are properly used; and
- 4) any other information concerning the implementation of this Act that the Secretary of the Interior considers appropriate.

Overview

On July 20, 2000, the U.S. Fish and Wildlife Service asked The Center for Organizational Excellence (COE) to conduct a resource requirements analysis that would set the stage for current-state improvements and prepare for future challenges. The purpose of this analysis was to gain an independent evaluation of the structure, capabilities, and performance of Federal Assistance's workforce and its major work processes.

Two desired outcomes were jointly identified for the analysis:

- 1) an improved data baseline for making strategic human resource decisions; and
- 2) a foundation for systematic, sustainable process improvement.

The COE report included 17 recommendations for improvement that were provided to the Service in early October 2000. On October 12, 2000 Congress adopted the Wildlife and Sport Fish Restoration Improvement Act of 2000.

With the COE report in hand and new legislation signed into law, the Service began implementing steps to improve the administration of the Programs.

1) Implementation Steps

Expenses For Administration. Allocation And Apportionment of Available Amounts

Prior to the Wildlife and Sport Fish Restoration Programs Improvement Act of 2000, the administrative budget for the Wildlife and Sport Fish Restoration grant programs was determined by Program needs. The authorized funding levels permitted in the Sport Fish and Wildlife Restoration Acts was up to 6% and 8% of Program funds respectively.

Accordingly, the approved administrative budget to administer the grant programs in FY 1999 was about \$30 million. The staff to administer the program was 147 FTEs.

The Act requires:

The Secretary of the Interior may not use more than the following amounts for administration of this Act.

For the Wildlife and Sport Fish Restoration grant programs combined:

- \$18,000,000 for fiscal years 2001 and 2002;
- \$16,424,000 for fiscal year 2003;
- for fiscal year 2004 and each fiscal year thereafter; the preceding fiscal year's allocation plus an increase based on the Consumer Price Index; and
- \$2.1 million each fiscal year for administration of other programs and activities (see pages 12 and 13).

Implementation:

The funding level for FY 2000 covered 147 FTEs. In implementing the Act it was evident that salary and support costs exceeded the amount available. The fact that the Federal Assistance budget is FTE intensive prompted Federal Assistance administrators to evaluate scenarios using fewer FTEs.

In an effort to reduce the number of FTEs, a position analysis was prepared based on the three major functions performed by staff in each Region; wildlife, fisheries, and administrative/fiscal. Minimum and maximum FTEs for each function were calculated (see Chart 1). Based on these calculations the number of FTEs needed Nationwide was 136. At that FTE level available funding was exceeded by \$1.4 million.

Chart 1
Minimum and Maximum FTE Distribution by Function

FTE Distribution by Function								
	Edu.	Fiscal	WL	Fish	Lands	Sm. Gr.	Admin.	RO FTEs
Region 1	1.00	2.00	3.50	3.00	0.00	1.00	4.00	14.50
Region 2	2.00	2.00	2.00	1.00	1.00	1.00	5.00	14.00
Region 3	2.00	2.50	3.50	3.00	1.50	1.00	5.50	19.00
Region 4	1.00	3.00	3.00	3.50	0.00	3.00	5.00	18.50
Region 5	1.50	3.00	3.25	3.25	1.00	1.00	4.50	17.50
Region 6	2.00	2.50	2.50	2.50	0.50	0.50	4.00	14.50
Region 7	0.20	0.50	0.80	0.70	0.00	0.10	2.70	5.00
Min/Max	1/2	2/3	2/3.5	2/3	0/1.5	0/1	4/5.5	11/19.5
RO Total								103.00

FTE Distribution by Function								
	Policy	Audit	Training	Cash Mgmt	FAIMS	Grant Ops	Admin	WO FTEs
Washington	4.00	3.00	3.00	1.00	9.00	2.50	10.50	33.00
Total FTEs								136.00

To bring projected costs within funding limits, further reduction and standardization in FTE allocations were considered along with an analysis of non-salary costs.

To standardize the Regional organizations, a hypothetical minimum FTE organization chart was produced. This minimum organizational chart was superimposed over each Regional chart in order to provide management information to determine where FTE reductions were possible/necessary.

Using the information from this analysis, further scenarios were

generated until sufficient reductions were made to make the organizational structure and the associated costs fit the available funding, providing for 125.5 FTEs.

As shown in Chart 2, below, funding was reduced to meet the requirements in the Act. The amounts shown for FY 2001-2003 were approved and distributed to the Regions by the Director in December 2000 and is summarized in the chart below.

The FY 2001 budget meets the combined \$18 million administrative funding limits for the Wildlife and

Sport Fish Restoration grant programs mandated in the Act. In addition, the Act provides for \$900,000 to administer certain other grants programs. Of this amount, \$500,000 is distributed among the Regions and Washington Office and is included in Chart 2. The other \$400,000 is allocated to administer the National Outreach and Communications Program, but not included in the chart.

Chart 2 depicts FTE staffing and funding scenarios for Regional and Washington Offices for FY 1999-2003, bringing about a reduction of FTEs from 147 in FY 1999 to 104.5 by FY 2003.

Chart 2
Budgets and FTE Levels for FY 1999 - FY 2003 (*dollars in thousands*)

Category	FY 1999	FY 2000	FY 2001	FY 2002	FY 2003
FTE	147	147	125.5	125.5	104.5
	<i>\$\$ / FTE</i>	<i>\$\$ / FTE</i>	<i>\$\$ / FTE</i>	<i>\$\$ / FTE</i>	<i>\$\$ / FTE</i>
Regions	9,792 / 106	9,119 / 106	8,093 / 95	8,815 / 95	7,707 / 79
Washington Office	15,751 / 41	14,315 / 41	3,955 / 30.5	3,905 / 30.5	3,387 / 25.5
Nationwide Operations:					
Service Overhead (CAM)	5,856	2,659 ¹	3,537	3,537	3,537
State Program Audits	2,121	2,317	1,800	1,800	1,800
Contract Audit of FA	0	0	300	300	300
SMARTLINK	134	134	134	134	134
Subtotal, Nationwide Ops	7,328	4,562	4,840	4,840	4,840
Estimated Costs	33,654	28,544	17,819	18,491	16,865
Current Funding Available	31,025	31,915	18,500²	18,500	16,924
Prior-Year Carryover	5,296	2,574	1,940	0	0
Redirected to State Apportionments		-5,500			
Total Available	36,321	28,989	20,440	18,500	16,924

¹ Estimated amount for transition year between former GAS and the new CAM.

² Current Funding Available in FY 2001 through 2003 includes \$500,000 for administration of other programs as described on page 3. The budget projections for FY 2003 reflect the required reduction of administrative funds to \$16.4 million in FY 2003 plus \$500,000 for other grant programs.

Period Of Availability; Apportionment of Unobligated Amounts*The Act requires:*

Administrative funds for each fiscal year shall remain available for obligation until the end of the fiscal year. Within 60 days after the end of a fiscal year, unobligated administrative funds shall be apportioned among the States using the standard Wildlife and Sport Fish Restoration Programs apportionment formulas.

Implementation:

Cost savings of \$5.5 million generated by Federal Assistance in FY 2000 have been returned to our State partners through the apportionment process.

The Act requires:

Puerto Rico is to receive a standard apportionment of the Wildlife Restoration Program's Hunter Education funds from any tax imposed on pistols, revolvers, bows, and arrows.

Implementation:

Puerto Rico has been included in the formula which calculates this portion of each State's wildlife restoration and hunter education apportionment.

Requirements and Restrictions Concerning Use of Amounts for Expenses for Administration. Authorized Expenses for Administration*The Act requires:*

Only expenses for administration that directly support the implementation of this Act that consist of costs in twelve (12) specified categories are allowable.

Implementation:

The 12 categories of authorized expenses for administration have been implemented into the Service budget planning process. All budget worksheets and cost estimates reflect the application of these 12 categories.



The following is a description of each category and a brief explanation of Service efforts to comply.

Categories 1 and 2, Personnel Costs (full-time/ part-time) for employees who directly administer this Act. Managers are monitoring time and attendance and certifying accuracy to ensure that personnel costs in categories 1 and 2 conform to the requirements of this Act. A standardized Federal Assistance timesheet is being developed to better account for employee time spent in administering this Act and its numerous program components.

Category 3, Personnel Support Costs Managers are reviewing and approving acquisition requests for goods and services to ensure compliance with this Act.

Category 4, Costs of Determining "Substantiality of Character and Design"

Grants that are substantial in character and design meet guidelines found in 50 CFR Part 80. To implement this, Service grant managers are responsible to ensure that grants submitted:

- identify and describe a need within the purposes of the relevant Act to be utilized;
- identify the objectives to be accomplished based on the stated need;
- utilize accepted fish and wildlife conservation and management principles, sound design, and appropriate procedures; and
- will yield benefits which are pertinent to the identified need at a level commensurate with project costs.

Category 5, Overhead Costs Overhead costs, including the costs of general administrative services, must be directly attributable to administration of this Act and be:

- based on actual costs determined by the approved direct cost allocation methodology; and
- in the case of costs that are not determined by a direct cost allocation methodology, an amount per FTE authorized under categories (1) and (2) that does not

exceed the amount charged for costs per FTE for any other division of the Service.

In FY 2001 the Service replaced its General Administrative Services (GAS) overhead calculation method with a new cost allocation methodology (CAM). This new methodology complies with the Act.

In FY 2000, overhead costs were about \$3 million less than in FY 1999.



Category 6, State Fish and Wildlife Agency Audits

The Service plans to continue to use administrative funds to audit State wildlife and sport fish grant activities. The Service will reduce the audit costs to more efficiently use Federal Assistance administrative funds.

Category 7, Audits of Service Expenses for Administration of this Act

The Service contracted with Walker and Company, LLP, to examine use of administrative funds associated with the various Acts. The auditor provided the Service with a draft report for FY 1999 on February 23, 2001, and is in the process of auditing FY 2000. In the recently submitted FY 1999 report, 12 recommendations were made. During the past year the Service has instituted procedures, policies and practices to address the report recommendations. The Service expects the FY 2000 report by May 2001.

Category 8, Training

The Service pays for training that directly relates to improving the knowledge and abilities of Federal and State staff to administer the Federal Assistance grants.

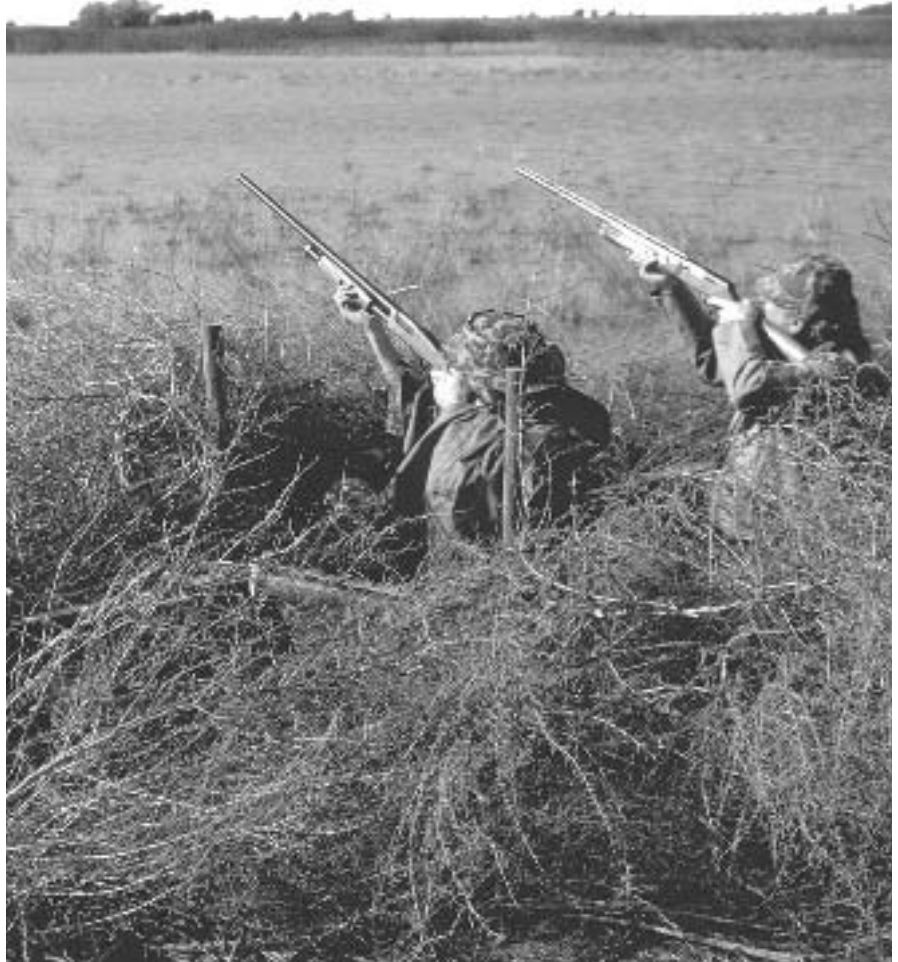
Category 9 and 10, Travel

Requests for travel authorization are evaluated based on the requirements of this Act. Only travel for purposes directly related to administration of State programs or projects is authorized.

Currently no Federal Assistance funds are budgeted for travel outside the United States for FY 2001.

Category 11, Relocation Costs

Only relocation expenses for personnel who will administer this Act on a full-time basis for at least 1 year after relocation, as certified by the Director at the time at which the relocation expenses are incurred; and



Relocation costs are anticipated in FY 2001 as the Service continues to implement the Act. Only costs associated with full-time Federal Assistance employees who directly administer the Acts will be covered.

Category 12, Costs to audit, evaluate, approve, disapprove, and advise concerning: submission of plans and projects; hunter education enhancement program grant funds; and multistate conservation grant program funds.

Steps have been taken to implement hunter education enhancement program grant funds and multistate conservation program grant funds.

Reporting Of Other Uses

The Act requires:

If the Secretary of the Interior determines that administrative funds should be used for an expense other than one described in this Act, the Secretary:

- shall submit a report describing the expense and the amount; and
- may use available amounts beginning 30 days after the date this report is submitted.

For any fiscal year, the Secretary of the Interior may use a maximum of \$25,000 from each restoration grant program.

Implementation:

No request for special use of administrative funds has been made.

Restriction on Use to Supplement General Appropriations

The Act requires:

The Secretary of the Interior shall not use Federal Assistance administrative funds to supplement the funding of any function for which general appropriations are made.

Implementation:

Federal Assistance is working with other Service fund managers to establish cost estimates or actual expense data quantifying reimbursement of costs incurred to be paid to Federal Assistance.

Audit Requirement

The Act Requires:

The Inspector General of the Department of the Interior shall arrange for biennial audits of obligations and expenditures for administering this Act. Audit contracts will be awarded under competitive procedures.

Implementation:

On March 30, 2000, the Service contracted with Walker and Company, LLP, to examine administration of the various Acts. Walker provided the Service with a report for FY 1999 and is in the process of auditing FY 2000. In the FY 1999 report, Walker made 12 recommendations. Federal Assistance implemented procedures, policies and practices to address report recommendations. The FY 2000 report is expected in May 2001. The Service has initiated discussions with the Interior Inspector General (IG) to contract audit services for the FY 2001 and FY 2002 audit cycle. The Service anticipates the IG will award this contract in FY 2002.

Firearm And Bow Hunter Education And Safety Program Grants

The Act requires:

This Act sets aside \$7,500,000 of Wildlife Restoration funds for hunter education and shooting range construction. These funds are

available for use during the fiscal year they are apportioned. Unused funds at the end of the fiscal year will be reappropriated to the States in the next apportionment cycle. The Act restricts the use of these funds to hunter education until the State spends an amount equal to their regular hunter education apportionment.

Implementation:

Procedures have been established to administer the new Firearm and Bow Hunter Education Safety Program Grants. Reporting/tracking codes have been established in the Federal Aid Information Management System

(FAIMS) to allow for grant tracking, application, processing, documentation, accounting, and cost reconciliation. Guidelines for administering these funds were distributed on March 12, 2001, with the apportionment letter to State grantees.

Multistate Conservation Grant Program

The Act requires:

This Act annually sets aside \$3,000,000 each from Wildlife Restoration and Sport Fish Restoration funds for a Multistate Conservation Grant Program, totaling \$6,000,000.



Implementation:

The Service has implemented the Multistate Conservation Grant Program. In cooperation with the International Association of Fish and Wildlife Agencies (IAFWA) the Service established an interim procedure for FY 2001 for handling multistate grants. Working with the IAFWA the Service is developing final procedures to implement this Program for FY 2002 and beyond. The Service received and approved a priority list of grants for funding in FY 2001 as authorized in the Act.

Expenses For Administration Of Certain Programs (Sport Fish Restoration Funds Only)

The Act requires:

For each fiscal year, the Secretary of the Interior may use a maximum of \$900,000 to administer the following programs:

- Coastal Wetlands Program;
- Clean Vessel Program;
- Boating Infrastructure Program; and
- National Outreach and Communications Program.

Implementation:

Funds have been allocated for the designated purposes.



Funding For Other Activities

The Act Requires:

\$200,000 shall be made available for each of the following Commissions:

- Atlantic States Marine Fisheries Commission;
- Gulf States Marine Fisheries Commission;
- Pacific States Marine Fisheries Commission; and
- Great Lakes Fisheries Commission.

In addition, \$400,000 shall be made available for the Sport Fishing and Boating Partnership Council.

Implementation:

Funds have been allocated for the designated purposes.

Wildlife And Sport Fish Restoration Programs

Designation Of Programs

The Act Requires:

The Programs established under this Act shall be known as the Federal Assistance Program for State Wildlife and Sport Fish Restoration.

Implementation:

The Service refers to actions called for in the Act as improvements to the Federal Assistance Program for State Wildlife and Sport Fish Restoration.

Assistant Director For Wildlife And Sport Fish Restoration Programs

The Act requires:

The position of Assistant Director for Wildlife and Sport Fish Restoration Programs shall be established in the United States Fish and Wildlife Service of the Department of the Interior. This Assistant Director will be responsible for the administration, management, and oversight of the Federal Assistance Program for State Wildlife and Sport Fish Restoration.

Implementation:

An Assistant Director for Migratory Birds and State Programs was established by the Director to be



responsible for the administration, management, and oversight of the Federal Assistance Program for State Wildlife and Sport Fish Restoration.

Reports And Certifications Implementation Report

This Act requires:

In conjunction with the Department of the Interior FY 2002 budget request, the Secretary shall submit a report on the steps that have been taken to comply with this Act.

Implementation:

This report is submitted in compliance with the directives given in the Act.

Projected Spending Report

The Act requires:

In conjunction with the Department of the Interior FY 2002 budget request, and each fiscal year thereafter, the Secretary shall submit a report detailing by category, the intended uses of administrative funds for the fiscal year.

Implementation:

The projected spending report for the FY 2002 budget request is detailed below. This chart includes:

- Detailed expenses for the Wildlife and Sport Fish Restoration Programs by administration category;
- Allocations for Certain Programs and Other Activities;
- Allocations for the Multistate Conservation Grant Program.

Division of Federal Assistance FY 2002 Budget by Administration Category (dollars in thousands)

FTE Allocation		125.5
No.	Description of Category	Amount
1	Personnel - Full Time	9,490
2	Personnel - Part Time 20 Hours or More	621
3	Support for Personnel	1,922
4	Determination of Substantiality of Plans & Projects ¹	—
5	Service Overhead	3,537
6	Audits of States	1,800
7	Audit of FA Administration Expenditures	300
8	Training of Federal & State Personnel	157
9	Travel in U.S., Territories, Canada	673
10	Foreign Travel	0
11	Relocation (PCS Moves)	0
12	Audit, Evaluate, Approve, etc., Grants ¹	—
Total Estimated Costs		18,500

Budget Authority
(**\$9M from WR and \$9M from SFR + \$500K from SFR2**) **18,500**

¹ Costs for categories 4 and 12 are included in the other categories above.

² The \$500,000 is allocated here as described on page 3 of this report. It is also included in "Other Grant Programs" in the following table.

Allocations for Certain Programs and Other Activities

Fish Commissions	800
Sport Fishing and Boating Partnership Council	400
Other Grant Programs	900
Total - Other Allocations	2,100

2) Description of Personnel Reductions

The effect of a Service-mandated Federal Assistance hiring freeze from November 1999, to November 29, 2000, coupled with the loss of staff through attrition, has reduced FTEs from 147 to 125 for FY 2001. The mandated funding reduction in FY 2003 of \$1.6 million, coupled with the Congressionally mandated pay adjustments, etc., results in an actual reduction of \$2.6 million. Based on this reduction, the Programs can support only 104 FTEs and associated costs in FY 2003. The workload analysis workshop, facilitated by COE, indicated that 136 FTEs are necessary to effectively accomplish the administration of the Programs.

3) Suggested Revisions Funding

Based on the analysis above the Service has concern about its ability to administer the Acts. Funding increases would allow for adequate organizational structure/staffing to deliver the services required to efficiently and effectively administer the grant programs directed by this Act.

The following revisions are suggested:

- 1) Increase the administrative funding level to \$19 million (\$9.5 million each for Wildlife and Sport Fish Programs) for FY 2002 to capture Congressionally mandated pay adjustments.
- 2) Eliminate the provision in the Act that reduces funding to \$16.4 million in FY 2003.
- 3) Provide for uncontrollable cost increases in FY 2003 and beyond. These increases are caused by Congressionally mandated pay adjustments.



Administration of Certain Programs

The Service received \$900,000 earmarked to administer the following other grant programs: Coastal Wetlands Program, Clean Vessel Program, the Boating Infrastructure Program, and the National Outreach and Communications Program. The cost of administering these Programs in FY 2000 was \$1.41 million. The estimated cost of administering these Programs in FY 2001 is \$1.46 million, and FY 2002 is \$1.51 million. (Estimates are adjusted for Congressional mandated pay adjustments, not CPIs.) This leaves a shortfall of \$610,000 in FY 2002.

The following revisions are suggested:

- 1) Increase administrative funds for the other grant programs to \$1.51 million in FY 2002.

- 2) Provide for uncontrollable cost increases in FY 2003 and beyond. These increases are caused by Congressionally mandated pay adjustments, and the CPI.

Multistate Conservation Grant Programs

The Act authorizes \$6 million annually for Multistate Conservation Grant Programs (\$3 million each under the Sport Fish and Wildlife Restoration Programs). The grants are for projects that benefit 26 or more States, a majority of States in a Service Region, or a regional association of State fish and game departments. It also provides funding to the Service for the National Survey of Fishing, Hunting and Wildlife-Associated Recreation as a grant project.

The Act does not specifically include:

- Federal Agencies as eligible recipients of grants except for the Service to carry out the National Survey of Fishing, Hunting and Wildlife-Associated Recreation.
- Authority for funding through contracts, interagency agreements, and other methods;
- Adjustments for Congressionally mandated pay adjustments, CPI, or other uncontrollable cost increases.

The following revisions are suggested:

- 1) Authorize Federal agencies as eligible recipients of financial assistance under the program.
- 2) Authorize the Secretary a broader range of authorities for funding mechanisms for multistate projects, including contracts, interagency agreements, and other methods, as well as grants that are appropriate for funding approved projects.
- 3) Provide for uncontrollable cost increases in FY 2003 and beyond. These increases are caused by Congressionally mandated pay adjustments.

Sport Fish Restoration Program Reverted Funds

The Act no longer allows the reversion of Sport Fish Restoration funds to support the Service's fisheries research efforts. However, the Act failed to amend all pertinent sections. Therefore, if it was the intent of the Act to eliminate the authorization for the Secretary to direct reverted apportionments to the fish research programs of the Service, changes in the language are needed.

The following revision is suggested:
Rewrite the language to allow reverted Sport Fish funds to be available to the Fisheries research programs of the Service.

Hunter Education Funds

The Act provides earmarked funding for enhancing hunter education and shooting range programs. How States will integrate these funds into their existing hunter education program is unknown at this time. A number of implementation strategies may be used. The Service will report on the status of the actual use of these funds with the submission of the FY 2003 budget.

Authorized Expenses For Administration

(Categories 1, 2, and 3)

In the sections of the Act which authorizes expenses for administration, the following words are used: "cost of employees who directly administer this Act on a full-time basis." This language brings into question many of the activities previously seen as beneficial to the administration of the program. Activities like membership on committees, teams and working groups, professional development, and outreach.

The Service has a philosophy that encourages teamwork, partnering, and involvement for its employees for work and off-duty activities. These activities include such things as: Scientist in the Schools Program, serving on regional teams like the Lake Champlain Fisheries Committee for New York and Vermont, and participating in wetland "adoption" projects, bond drives, and the Combined Federal Campaign. These kinds of activities require employee planning and involvement and build a sense of Service identity.

Some Federal Assistance employees feel that the language in the Act which requires funds to be used only for costs which "directly" support administration of the Act excludes them from participating as members of the Service team. Their lower morale decreases efficiency. Retaining existing employees and recruiting new ones also suffers.



Federal Assistance Integration in Service Activities

Preventing Federal Assistance employees from contributing to Service activities such as serving on teams and committees negatively effects their productivity and accomplishments in the long term. Many Federal Assistance employees are members of professional organizations like the American Fisheries Society and The Wildlife Society. The Service has encouraged participation in professional societies as a means to interact with peers, to stay informed on Regional and National events, and to build trust and confidence among the Service, Federal Assistance staff, and State peers. Preventing Federal Assistance staff from participating in these professional growth and networking events imposes limitations on their

professional growth and standing in the Service and conservation communities.

Whether Federal Assistance staff are allowed to serve on committees, teams and working groups which bring biological knowledge and other technical skills to bear on Regional and Nationwide issues is a serious issue. The problem is that these types of activities do not meet the "directly support implementation" of the Act. Many Regional Office Federal Assistance staff, have extensive and unique knowledge, skill and abilities which they bring to bear on Regional and National issues by serving on committees, teams and working groups. Serving on watershed based ecosystem teams that include other Federal, State and NGO members is an example of this type of service. The purpose of these teams is to keep the

biological management community informed of each other's priorities and activities. Often partnerships are formed that enhance effectiveness of the Service, States, and NGOs. Training to develop biological, technological or administrative knowledge and skills may not "directly" contribute to the administration of the Act. However, it helps equip Federal Assistance staff to make determinations relating to substantiality in character and design of grant proposals, provide assessments of grantee work accomplished, and enable staff to offer more meaningful technical support. An example of this training is the Service Impact Training. Its goal is to improve the knowledge, skill and ability of Service employees to work together by understanding how they and other people approach tasks. Other useful training, that updates



the knowledge, skills, and abilities of Federal Assistance grant managers might not be considered to “directly support implementation” of the Act, but would still contribute to more informed decisions and application of management processes.

Service employees, including Federal Assistance staff, routinely speak to school, hunting, angling, and civic groups about wildlife conservation, Service employment opportunities, wildlife and sport fish restoration efforts, and Federal Assistance grant programs to name a few.

Because the Service supports allowing all employees to participate in Service “family” and professional activities, Federal Assistance employees will also participate.

Part-time Employees

The Act states that personnel costs for employees who administer this Act on a part-time basis for at least 20 hours a week is allowable. Federal employees have many alternate work schedules available to them. For example, two employees work exclusively for Federal Assistance, but share one job. One works 16 hours each week and the other works 24 hours. The Service will continue to use administrative funds for their salaries and other costs since their time is documented exclusively on grant administration duties. The Service also supports the Student Cooperative Education Program (SCP). These are typically summer, part-time employees. Costs allowable under the 12 categories are paid for students who work for Federal Assistance under SCEP even though they may work less than 20 hours each week.

Staff who work 100% of the time for Federal Assistance in grant related activities, but who work less than 20 hours per week are still considered “full-time” Federal Assistance



employees. All of their time is spent doing Federal Assistance work. The fact that they are part time Federal employees does not effect the intent of this Act that only costs approved in this Act be paid for with administrative funds.

Lifting the restriction that all employees paid with Federal Assistance administrative funds must be at least half time employees would provide opportunity to hire seasonal staff for some special tasks that support Federal Assistance administration.

The following revision is suggested:
Revise Category 2 to read as follows: “personnel costs of employees who directly administer this Act on a part-time basis for at least 20 hours each week, not to exceed the portion of those costs incurred with respect to the work hours of the employee during which the employee directly administers this Act, as those hours are certified by the supervisor of the employee”;

4) Other Information

The overall impacts of implementing this Act are yet to be seen.

The numerous reviews of Service administration of the Federal Assistance grant programs have caused the Service to focus greater attention on the management issues impacting these programs. Significant effort has been directed toward improving the Federal Assistance Program as directed in this Act.

The implementation of this Act has institutionalized management controls and focused Service leadership on important Federal Assistance administration issues.

Communication about the Federal Assistance Programs among the Service Directorate, State partners, NGOs, and Federal Assistance administrators has improved and expanded.

Attention has been given to the administrative needs of the Federal Assistance Program by highest levels of Service management. There is improved awareness and involvement of Regional Office management in Federal Assistance issues.

The General Administrative Services (GAS) overhead calculation method was replaced by a new Cost Allocation Methodology (CAM). This change resulted in a net savings after implementation of approximately \$3.0 million. These funds were re-allocated to the States in their FY 2000 apportionment.

Due to numerous management actions (hiring freeze, reduction in Management Assistance Team expenses, adoption of CAM) which resulted in savings in FY 2000 an additional \$2.5 million was apportioned to the States in FY 2001. More effective approaches/processes have been established or initiated, including:

- Material weaknesses/corrective actions as identified by Federal Aid Process Improvement Teams are being implemented and tracked by the Department of the Interior.
- Recommendations from the State/Federal FAIMS review team have been implemented.
- Recommendations made by the Federal/State Federal Aid Review Team have been addressed.
- The Service financial system and FAIMS interface was implemented in August 2000.

- FAIMS support costs will be reduced by approximately 50 percent by allowing the Oracle support contract to expire in March 2001.
- A more responsive and involved Washington & Regional Office leadership team is in place.
- Budget and functional analyses have been accomplished.
- Federal Assistance Offices have been funded and reorganized along functional lines as suggested in the COE recommendations. Standard position descriptions are being developed.
- Federal Assistance policy documents are being reviewed and re-written in plain English to reflect recent changes. Two chapters have been reissued and twelve chapters are in the approval process with publication expected during FY 2001. The remaining 11 chapters will be re-written during FY 2001 and FY 2002.
- Apportionments for the new hunter education enhancement funds have been calculated and distributed.

As evidenced above, the Service has made significant progress in implementing the Act and redefining the Federal Assistance Program for Wildlife and Sport Fish Restoration. While the Service faces significant management challenges to fully implement the Act, the suggested revisions will help us meet these management challenges.

U.S. Department of the Interior
U.S. Fish & Wildlife Service
Division of Federal Aid

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